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REVISED PIERCE PROPOSED AMENDMENT # 1

DATE PREPARED: June 17, 2011

Arizona Corporation Commission

DOCKETED

JUN 1 7 2011

COMPANY:

Arizona Public Service Company

DOCKET NO:

E-01345A-11-0175

OPEN MEETING DATES: June 21 and 22, 2011

DOCKETED BY

AGENDA ITEM: U-15

Page 5, Line 16

INSERT new Finding of Fact:

"22. Given the constraints on Commission resources, we do not believe that it is an efficient use of those resources to require a Commission order to establish the new TCA rate, after the transmission rates have been established by FERC. As described above, FERC adjusts transmission rates for APS yearly using the formula method. The cost allocation method used by FERC assigns transmission costs to the various customer classes. We believe it may be more efficient to require APS to file notice with Docket Control setting forth the results of FERC's formula rate calculation. Within a set time period after that notice filing, APS could automatically adjust its transmission rates unless Staff requests Commission review. We believe such an approach will also enhance transparency by accurately conveying to customers that it is FERC, not the Commission, that sets APS' transmission rates. Accordingly, we direct APS to propose a modification to its TCA to include provisions consistent with this discussion in its current rate case, Docket No. E-01345A-11-0224. Further, Staff is directed to continue its participation in APS' FERC Open Access Transmission Tariff applications which establish APS' transmission rates."

Page 6, Line 7

INSERT new Ordering Paragraph:

"IT IS FURTHER ORDERED that Arizona Public Service Company shall propose a modification to its Transmission Cost Adjustor in its current rate case, Docket No. E-01345A-11-0224, that is consistent with the discussion in Finding of Fact 22."

Conforming changes.		11:	11:5 9 FI MII INC	
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-	Failed	Not Offered	Withdrawn	